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12 TAYLOR THOMSON

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14 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

15 Taylor Thomson

16 Plaintiff,

17 v.

18 Persistence Technologies BVI Pte Ltd.,
Tushar Aggarwal, Ashley Richardson,

19 Defendants.

20 Case No. 2:23-cv-04669-MEMF-MAR

21 **PLAINTIFF TAYLOR THOMSON'S
REPLY IN SUPPORT OF MOTION
FOR A PROTECTIVE ORDER**

22 The Honorable Margo A. Rocconi,
United States Magistrate Judge

23 Date: November 12, 2025

24 Time: 11:00 a.m.

25 Courtroom: 790

1 **I. INTRODUCTION**

2 Defendant Ashley Richardson’s (“Defendant”) Opposition, (Dkt. 136
3 [hereinafter, “Opp.”]), is untethered from the facts and the law. Plaintiff Taylor
4 Thomson’s (“Plaintiff”) Motion for a Protective Order, (Dkt. 127 [hereinafter,
5 “Mot.”]), seeks nothing extraordinary—only entry of a protective order based on this
6 Court’s sample protective order, which applies equally to *both parties* and is designed
7 to safeguard confidential discovery information, including financial, medical, and
8 personal materials.

9 Rather than address that straightforward issue, Defendant’s Opposition is
10 divorced from reality and filled with irrelevant, inaccurate, and inflammatory
11 accusations. None of Defendant’s arguments refute that good cause exists for entry of
12 the protective order under Rule 26(c). Plaintiff’s Motion should therefore be granted
13 in full.

14 **II. ARGUMENT**

15 **A. Plaintiff Seeks the Court’s Standard Protective Order**

16 Plaintiff’s motion seeks entry of a protective order based on this Court’s Sample
17 Stipulated Protective Order, with only minimal edits for case-specific clarity. The
18 proposed order protects confidential information for *both sides* and ensures that
19 discovery materials containing sensitive financial or medical data are not publicly
20 misused. It is a routine, balanced measure consistent with the Court’s own model form.

21 For more than a year, Plaintiff’s counsel has attempted in good faith to obtain
22 Defendant’s agreement to this standard order. Defendant repeatedly refused, ignored
23 multiple meet-and-confer efforts, and then filed her own unilateral “protective order”
24 request without notice to Plaintiff. (Mot. at 1–2.) Plaintiff was therefore left with no
25 choice but to seek the Court’s assistance.

26 In response, Defendant offers a litany of irrelevant and inaccurate accusations,
27 claiming that the motion is an “asymmetric speech restraint” or an effort to “gag” her.

1 (Opp. at 3–4.) Those assertions are demonstrably false. The proposed order applies
2 *equally to both parties* and imposes no restrictions on public discussion of non-
3 discovery information or facts already in the public record. It simply ensures that
4 confidential discovery materials—whether produced by Plaintiff or Defendant—
5 remain protected from misuse outside this litigation.

6 Defendant’s rhetoric about “media campaigns,” “public narratives,” and “PR
7 gags,” (see Opp. at 3–5), has nothing to do with the governing standard under Federal
8 Rule of Civil Procedure 26(c). The only question before the Court is whether good
9 cause exists for entry of a protective order governing confidential discovery
10 materials—and there plainly is. Defendant’s filing, devoid of legal authority or factual
11 support, reflects a fundamental misunderstanding of the purpose of Rule 26(c), which
12 is not to control public relations but to preserve the integrity and fairness of discovery.

13 **B. Good Cause Exists for Entry of the Protective Order**

14 Plaintiff has easily met the Rule 26(c) “good cause” standard. Discovery in this
15 case has involved, and will continue to involve, the exchange of highly confidential
16 materials, including nonpublic financial records, such as banking, investment, and
17 cryptocurrency information; and medical records related to Defendant’s own claims.
18 Courts routinely find good cause to protect such materials. *See Mei Ma v. Convergent*
19 *Outsourcing, Inc.*, 2017 WL 11634740, at *1 (C.D. Cal. Apr. 21, 2017) (protective
20 order appropriate over financial information).

21 Defendant offers no contrary authority. Instead, she again irrelevantly discusses
22 “ordinary designations” or lack of explanation of how “Defendant has misused any
23 discovery” and falsely asserts that Plaintiff herself “placed materials in the public
24 record and press.” (Opp. at 3.) While Plaintiff, correctly, is focused on the parties’
25 mutual interest in the confidentiality of the documents and information produced in
26 this action, Defendant remains obsessed with the press and public relations.

1 Defendant's Opposition only underscores the need for a protective order to safeguard
2 confidential information in this case.

3 The Court's standard protective order will protect *both parties* equally and
4 prevent further harm. Defendant's refusal to agree to such routine safeguards only
5 confirms that judicial intervention is required.

6 **III. CONCLUSION**

7 For the foregoing reasons, Plaintiff respectfully requests that the Court grant her
8 Motion for Protective Order and enter the Proposed Protective Order.

9 Dated: October 29, 2025

10 **MCDERMOTT WILL & SCHULTE LLP**

11 By: /s/ Julian L. André
12 JULIAN L. ANDRÉ
13 TODD HARRISON
JOSEPH B. EVANS

14 Attorneys for Plaintiff
15 TAYLOR THOMSON

1 **CERTIFICATE OF COMPLIANCE**
2

3 The undersigned, counsel of record for Plaintiff Taylor Thomson certifies that
4 this brief contains 640 words, which complies with the word limit of L.R. 11-6.1.
5

6 Dated: October 29, 2025

7 _____
8 /s/ Julian L. André
9

10 Julian L. André
11

12 McDERMOTT WILL & SCHULTZE LLP
13 ATTORNEYS AT LAW
14 LOS ANGELES
15

PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Schulte, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On October 29, 2025, I caused to be served copies of the following documents:

**PLAINTIFF TAYLOR THOMSON'S REPLY IN SUPPORT OF MOTION
FOR PROTECTIVE ORDER**

on the following party via U.S. Mail and Electronic Mail:

Ashley Richardson
25399 Markham Lane
Salinas, CA 93908
ashrichardson@mac.com

Defendant in Pro Per

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 29, 2025 in Los Angeles, California.

/s/ Joshua Yim
Joshua Yim